

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Television Systems	)	
and Their Impact upon the	)	MB Docket No. 87-268
Existing Television Broadcast	)	
Service	)	
	)	

**COMMENTS OF  
GEORGIA PUBLIC TELECOMMUNICATIONS COMMISSION**

Georgia Public Telecommunications Commission ("GPTC"), licensee of noncommercial educational television Stations WGTV, Athens, Georgia; WVAN-TV, Savannah, Georgia; and WMUM-TV, Cochran, Georgia, hereby submits these Comments pursuant to paragraph 16 of the Commission's *Seventh Further Notice of Proposed Rule Making* ("*Seventh Further Notice*")<sup>1</sup> in the above-captioned proceeding. These Comments correct certain data concerning Stations WGTV, WVAN-TV, and WMUM-TV contained in Exhibit B of the *Seventh Further Notice*. The corrections are set forth below.

**Station WGTV, Facility ID No. 23948:** Exhibit B indicates that Station WGTV will operate on DTV Channel 8 with an ERP of 15.6 kw and Antenna ID 74366 at a HAAT of 305 meters. The information as to Station WGTV's ERP and Antenna ID is incorrect.

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<sup>1</sup> *In re Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, MM Docket No. 87-268, Seventh Further Notice of Proposed Rule Making, FCC 06-150, (rel. Oct. 20, 2006).

In its Form 381 for WGTV, File No. BCERET-20041105ABW, GPTC certified that it would operate its post-transition DTV station based on its allotted replication facilities. The existing DTV Table of Allotments, as amended, specifies operation on DTV Channel 12 with an ERP of 16 kW at a HAAT of 305 m.<sup>2</sup> As the attached Engineering Statement of William Godfrey, of Kessler & Gehman Consulting Engineers (“Engineering Statement”) indicates, the facilities specified in Exhibit B would not replicate the coverage of WGTV because (i) the specified ERP is too low and (ii) the specified antenna is directional, while WGTV’s antenna is omnidirectional. To replicate the coverage of WGTV, the ERP must be 18 kW and the antenna must be omnidirectional.

Requiring GPTC to operate WGTV-DT with an ERP of 15.6 kw and a directional antenna would deprive at least 144,305 viewers of the noncommercial educational programming broadcast on WGTV, as well as the advanced services that will be provided. It will also deprive GPTC, which depends on viewer support for a significant portion of its operating budget, of the potential financial contributions of these would-be former viewers, as well as subjecting GPTC to the additional expense of the directional antenna. As shown in the attached Engineering Statement, these results, which would be contrary to the public interest, can be avoided by allotting WGTV-DT an ERP of 18 kW using an omnidirectional antenna, allowing it to replicate the existing WGTV NTSC facilities.

Accordingly, GPTC requests that the Commission correct Exhibit B to specify an ERP of 18 kW and an omnidirectional antenna for Station WGTV.

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<sup>2</sup> *In re Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations (Athens, Georgia)*, Report and Order, 17 FCC Rcd. 13671 (2002).

**Station WVAN-TV, Facility ID No. 23947:** Exhibit B indicates that Station WVAN-TV will operate on DTV Channel 9 with an ERP of 9.72 kw and Antenna ID 74979 at a HAAT of 293 meters. The information as to Station WVAN-TV's ERP and Antenna ID is incorrect.

In its Form 381 for WVAN-TV, File No. BCERET - 20041105ABS, GPTC certified that it would operate its post-transition DTV station based on its allotted replication facilities. The existing DTV Table of Allotments, as amended, specifies operation on DTV Channel 13 with an ERP of 10 kW at a HAAT of 293 m.<sup>3</sup> As the attached Engineering Statement shows, the facilities specified in Exhibit B would not replicate the coverage of WVAN-TV because (i) the specified ERP is too low and (ii) the specified antenna is directional, while WVAN-TV's antenna is omnidirectional. To replicate the coverage of WVAN-TV, the ERP must be 20 kW and the antenna must be omnidirectional.

Requiring GPTC to operate WVAN-DT with an ERP of 9.72 kw and a directional antenna would deprive at least 87,309 viewers of the noncommercial educational programming broadcast on WVAN-TV, as well as the advanced services that will be provided. It will also deprive GPTC, which depends on viewer support for a significant portion of its operating budget, of the potential financial contributions of these would-be former viewers, as well as subjecting GPTC to the additional expense of the directional antenna. As shown in the attached Engineering Statement, these results, which would be contrary to the public interest, can be avoided by allotting WVAN-DT an ERP of 20 kW using an omnidirectional antenna, allowing it to replicate the existing WVAN-TV NTSC facilities.

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<sup>3</sup> *In re Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations (Wrens, Savannah, Waycross, Dawson, and Pelham, Georgia)*, Report and Order, 17 FCC Red. 15424 (2002).

Accordingly, GPTC requests that the Commission correct Exhibit B to specify an ERP of 20 kW and an omnidirectional antenna for Station WVAN-TV.

**Station WMUM-TV, Facility ID No. 23935:** Exhibit B indicates that Station WMUM-TV will operate on DTV Channel 7 with an ERP of 22 kw and an unspecified antenna at a HAAT of 369 meters. The construction permit for Station WMUM-TV, File No BPEDT-20000425AAQ, specifies Antenna ID 32779 (Dielectric TF-2HT). GPTC brings this omission in Exhibit B to the attention of the Commission for correction.

### **Conclusion**

For the reasons given above, GPTC requests that the Commission correct Exhibit B to the *Seventh Further Notice* to specify an ERP of 18 kW and an omnidirectional antenna for Station WGTW, an ERP of 20 kW and an omnidirectional antenna for Station WVAN-TV, and the correct Antenna ID for Station WMUM-TV.

Respectfully submitted,



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